# WOODHOUSE EXHIBIT 3

# EXHIBIT B

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| **[For Aurelien Rodriguez and Hugo Touvron]** (pre-train* OR pretrain* OR dataset* OR "data set*" OR "training data") AND (llama OR genesis OR "large language model" OR LLM) | 51,000 | 57,279 |
| ((Llama OR Genesis) w/15 "open source") OR ((Llama OR Genesis) w/5 (open AND (release OR license))) | 7,985 | 12,050 |
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| ((Copyright* w/15 compensat*) OR (Copyright* w/15 consent*) OR (Copyright* w/15 licens*) OR (copyright* w/15 credit*) OR (copyright* w/15 attribut*) OR (author* w/15 compensat*) OR (author* w/15 consent*) OR (author* w/15 licens*) OR (author* w/15 credit*) OR (author* w/15 attribut*)) AND (LLM OR Llama OR GenAI OR train* OR "large language model") | 4,138 | 16,269 |
| (market* w/25 Llama) OR (market* w/25 Genesis) OR (promo* w/25 Llama) OR (promo* w/25 Genesis) | 3,390 | 7,413 |
| ███████████████ ███████████████ ████████████ ███████████████ ██████ AND (licens* OR contract* OR agreement* OR negotiat* OR partner*) | 2,937 | 9,915 |
| Books3 OR "books 3" OR b3g OR Gutenberg OR Libgen OR "lib gen" OR "Library genesis" | 2,785 | 9,307 |
| █████████████ █████████████ ███████████████ ██████████ ████ AND (licens* OR contract* OR agreement* OR negotiat* OR partner*) | 1,773 | 5,735 |
| ████████████████ AND (licens* OR contract* OR agreement* OR negotiat* OR partner*) | 1,673 | 6,065 |
| libgen OR "library genesis" OR "anna's archive" OR "annas archive" OR bibliotik OR zlibrary OR z-library | 1,494 | 2,348 |
| Books3 OR "books 3" OR b3g OR Gutenberg | 1,448 | 7,381 |
| (go-to-market OR "go to market" OR "executive summary" OR roadmap OR "road map" OR SWOT) w/20 (Llama OR Genesis) | 1,129 | 2,192 |

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|---|---|---|
| (Schumer w/10 AI) OR (Schumer w/10 Artificial) OR (senat* w/10 AI) OR (senat* w/10 Artificial) | 834 | 1,118 |
| (mitigat* w/20 memoriz*) OR (mitigat* w/20 copyright) OR (mitigat* w/20 IP) OR (mitigat* w/20 "intellectual property") | 788 | 1,255 |
| **[For all ESI custodians other than Aurelien Rodriguez and Hugo Touvron]** (pre-train* OR pretrain* OR dataset* OR "data set*" OR "training data") AND **[Header includes:]** ("Library Genesis" OR LibGen OR "lib gen" OR libgen.li OR Z-Library OR "z library" OR zlibrary OR B-ok OR b-ok.cc OR zlib OR zlib.io OR Sci-Hub OR scihub OR sci-hub.pub OR Bibliotik OR bibliotik.me OR "the eye" OR the-eye.eu OR "Anna's Archive" OR annas-archive.org OR shawn@keenagi.com OR shawnpresser@gmail.com OR Stella OR Biderman OR eleuthero.ai OR Eleuther OR (leo w/3 gao) OR leogao* OR microsoft OR microsoft.com OR OpenAI OR openai.com OR anthropic OR anthropic.com OR Dell OR dell.com OR Cloudflare OR cloudflare.com OR Qualcomm OR qualcomm.com OR timdettmers OR Dettmers" | 567 | 908 |
| ██████████████████ ███████████ ████████████ w/10 (licens* OR contract* OR agreement* OR negotiat* OR partner*)) AND (LLM OR Llama OR GenAI OR train* OR "large language model") | 456 | 3,194 |
| (("meta AI" w/5 Facebook) OR ("meta AI" w/5 Instagram) OR ("meta AI" w/5 Reels) OR ("meta AI" w/5 whatsapp) OR ("meta AI" w/5 Threads) OR ("meta AI" w/5 oculus) OR ("meta AI" w/5 metaverse) OR ("meta AI" w/5 orion) OR ("meta AI" w/5 rayban)) AND (integrate OR incorporate OR augment OR monetize OR monetization) | 410 | 817 |
| (licens* w/3 book*) OR (licens* w/3 textbook*) OR (licens* w/3 novel*) OR (licens* w/3 literature) | 403 | 2,672 |
| (Software OR tool) w/20 ((Copyright* w/15 compensat*) OR (Copyright* w/15 consent*) OR (Copyright* w/15 licens*) OR (copyright* w/15 credit*) OR (copyright* w/15 attribut*) OR (author* w/15 compensat*) OR (author* w/15 consent*) OR (author* w/15 licens*) OR (author* w/15 credit*) OR (author* w/15 attribut*)) | 346 | 1,120 |
| (litigation OR lawsuit OR "fair use") w/20 (Kadrey OR Silverman OR Golden OR Woodson OR Greer OR Snyder OR Hwang OR Coates OR Lippman OR Klam OR Diaz OR Díaz OR Terkeurst OR Farnsworth) | 318 | 495 |

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|---|---|---|
| (licens* w/3 books) OR (licens* w/3 textbooks) OR (licens* w/3 novels) OR (licens* w/3 literature) | 300 | 2,460 |
| ((Compet* w/5 analys*) OR (Compet* w/5 assess*)) AND (Llama OR Genesis) | 255 | 729 |
| "publicly available datasets" AND llama | 229 | 1,061 |
| (Llama w/10 budget) OR (Llama w/10 "operational expenses") OR (Llama w/10 "gross margin") OR (Llama w/10 "operating margin") OR (Llama w/10 profit) OR (Llama w/10 EPS) OR (Llama w/10 "earnings per share") | 222 | 486 |
| ((Llama w/5 Facebook) OR (Llama w/5 Instagram) OR (Llama w/5 Reels) OR (Llama w/5 whatsapp) OR (Llama w/5 Threads) OR (Llama w/5 oculus) OR (Llama w/5 metaverse) OR (Llama w/5 orion) OR (Llama w/5 rayban)) AND (integrate OR incorporate OR augment OR monetize OR monetization) | 139 | 464 |
| ((book* w/20 storytelling) OR (book* w/20 narrative) OR (book* w/20 value) OR (book* w/20 benefit)) AND (dataset OR "training data") | 116 | 907 |
| ██████████████████ ████████████ ███████ w/10 (licens* OR contract* OR agreement* OR negotiat* OR partner*)) AND (LLM OR Llama OR GenAI OR train* OR "large language model") | 108 | 171 |
| "AI Insight Forum" | 101 | 126 |
| "theorem proving" AND (dataset OR "training data") | 100 | 522 |
| torrent AND (dataset OR "training data") | 97 | 434 |
| ("business plan" OR "marketing plan" OR "growth plan" OR (business* w/3 summar*) OR (market* w/3 summar*) OR (grow* w/3 summar*) OR (strateg* w/3 summar*)) w/50 Llama | 87 | 166 |
| ((Shawn w/3 Presser) OR shawnpresser) w/50 (pre-train* OR pretrain* OR dataset* OR "data set*" OR "training data" OR "the pile" OR Llama OR Genesis) | 83 | 616 |
| ████████████████ ████████████ ████████ w/10 (licens* OR contract* OR agreement* OR negotiat* OR partner*)) AND (LLM OR Llama OR GenAI OR train* OR "large language model") | 73 | 176 |

| Query | | |
|---|---:|---:|
| ((Richard w/3 Kadrey) OR (Sarah w/3 Silverman) OR (Christopher w/3 Golden) OR (Jacqueline w/3 Woodson) OR (Andrew w/3 Greer) OR (Andrew w/3 Sean)) w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 70 | 108 |
| (Contract* w/30 RLHF) OR (Contract* w/30 annotation*) OR (Agreement* w/30 RLHF) OR (Agreement* w/30 annotation*) OR (statement w/30 RLHF) OR (SOW w/30 RLHF) OR (statement w/30 annotation*) OR (SOW w/30 annotation*) OR (SOW w/30 RLHF) | 53 | 69 |
| ((Sean w/3 Greer) OR (Rachel w/3 Snyder) OR (David w/3 Hwang) OR (Ta-Nehisi w/3 Coates) OR (Laura w/3 Lippman)) w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 30 | 74 |
| (christopher w/3 farnsworth) OR "blood oath" OR "president's vampire" OR "red, white, and blood" OR "red, white, & blood" OR "a nathaniel cade story" OR "the burning men" OR "eternal world" OR killfile OR "Deep state: a nathaniel cade story" OR ("deep state" AND farnsworth) OR (flashmob AND farnsworth) | 22 | 2,341 |
| ("Meta AI" w/10 budget) OR ("Meta AI" w/10 "operational expenses") OR ("Meta AI" w/10 "gross margin") OR ("Meta AI" w/10 "operating margin") OR ("Meta AI" w/10 profit) OR ("Meta AI" w/10 EPS) OR ("Meta AI" w/10 "earnings per share") | 22 | 35 |
| ((Matthew w/3 Klam) OR (Junot w/3 Diaz) OR (Junot w/3 Díaz) OR (Lysa w/3 Terkeurst)) w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 22 | 24 |
| (Llama w/15 stock) AND (price OR valuation OR increase OR impact OR decrease) | 20 | 51 |
| ("Meta AI" w/15 stock) AND (price OR valuation OR increase OR impact OR decrease) | 13 | 20 |

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| ((metaAI w/5 Facebook) OR (metaAI w/5 Instagram) OR (metaAI w/5 Reels) OR (metaAI w/5 whatsapp) OR (metaAI w/5 Threads) OR (metaAI w/5 oculus) OR (metaAI w/5 metaverse) OR (metaAI w/5 orion) OR (metaAI w/5 rayban)) AND (integrate OR incorporate OR augment OR monetize OR monetization) | 12 | 12 |
| (eleuther w/20 books3) OR (eleutherAI w/20 books3) | 11 | 13 |
| (book* w/10 long-range) OR (book* w/10 "context model*") | 5 | 57 |
| eye w/20 books3 | 5 | 13 |
| (MetaAI w/10 budget) OR (MetaAI w/10 "operational expenses") OR (MetaAI w/10 "gross margin") OR (MetaAI w/10 "operating margin") OR (MetaAI w/10 profit) OR ("Met AI" w/10 EPS) OR (MetaAI w/10 "earnings per share") | 3 | 25 |
| ("Sandman Slim" OR Bedwetter OR Ararat OR "Aloha from Hell" OR "Everything Box" OR "Kill the Dead" OR "Perdition Score" OR "Wrong Dead Guy" OR "Dead Ringers") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 1 | 3 |
| ("The Best Yes" OR (Unglued w/10 TerKeurst) OR "Unglued: Making Wise Choices") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 1 | 2 |
| ("After I'm Gone" OR "No Visible Bruises" OR "Brown Girl Dreaming" OR "Water Dancer" OR "We Were Eight Years in Power" OR "Brief Wondrous Life of Oscar Wao") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 0 | 0 |

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|---|---|---|
| ("How it was for me" OR (Less w/10 Greer) OR "Path of Minor Planets" OR "Golden Child" OR "Trying to find Chinatown and Bondage" OR "Trying to find Chinatown & Bondage") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 0 | 0 |
| ("Pandora Room" OR Snowblind OR "Beautiful Struggle" OR (Drown w/10 Diaz) OR (Drown w/10 Díaz) OR "Confessions of Max Tivoli" OR "M. Butterfly" OR "Who is Rich?") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 0 | 0 |
| ("Sam, the cat and other stories" OR "Sam, the cat & other stories" OR "In a Strange City" OR "Lady in the Lake") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 0 | 0 |
| ((Embraced w/20 TerKeurst) OR (Embraced w/5 Devotions) OR "It's Not Supposed to Be this way Study Guide" OR "Uninvited – Study Guide" OR "Made to Crave Devotional") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 0 | 0 |
| ((Feathers w/10 Woodson) OR "Harbor Me" OR "If You Come Softly" OR "Miracle's Boys" OR "Red at the Bone" OR (Uninvited w/20 TerKeurst) OR "Capture His Heart") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 0 | 0 |

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|---|---|---|
| ((Sunburn w/10 Lippman) OR "What the dead know" OR "Wilde Lake" OR "After Tupac" OR "Another Brooklyn" OR (Behind w/10 Woodson) OR "Beneath a Meth Moon") w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies) | 0 | 0 |
| (MetaAI w/15 stock) AND (price OR valuation OR increase OR impact OR decrease) | 0 | 0 |

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| (Copyright* w/15 compensat*) OR (Copyright* w/15 consent*) OR (Copyright* w/15 licens*) OR (copyright* w/15 credit*) OR (copyright* w/15 attribut*) OR (author* w/15 compensat*) OR (author* w/15 consent*) OR (author* w/15 licens*) OR (author* w/15 credit*) OR (author* w/15 attribut*) | 5,172 | 5,630 |
| ██████████ AND (licens* OR contract* OR agreement* OR negotiat* OR partner*) | 1,836 | 2,042 |
| (mitigat* w/20 memoriz*) OR (mitigat* w/20 copyright) OR (mitigat* w/20 IP) OR (mitigat* w/20 "intellectual property") | 1,560 | 1,615 |
| ██████████ AND (licens* OR contract* OR agreement* OR negotiat* OR partner*) | 1,291 | 1,418 |
| libgen OR "library genesis" OR "anna's archive" OR "annas archive" OR bibliotik OR zlibrary OR z-library | 810 | 836 |
| ██████████ AND (licens* OR contract* OR agreement* OR negotiat* OR partner*) | 747 | 770 |
| (("meta AI" w/5 Facebook) OR ("meta AI" w/5 Instagram) OR ("meta AI" w/5 Reels) OR ("meta AI" w/5 whatsapp) OR ("meta AI" w/5 Threads) OR ("meta AI" w/5 oculus) OR ("meta AI" w/5 metaverse) OR ("meta AI" w/5 orion) OR ("meta AI" w/5 rayban)) AND (integrate OR incorporate OR augment OR monetize OR monetization) | 527 | 950 |
| (("book* w/20 storytelling") OR (book* w/20 narrative) OR (book* w/20 value) OR (book* w/20 benefit)) AND (dataset OR "training data") | 442 | 446 |
| "theorem proving" AND (dataset OR "training data") | 421 | 425 |

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|---|---:|---:|
| (Llama w/10 budget) OR (Llama w/10 "operational expenses") OR (Llama w/10 "gross margin") OR (Llama w/10 "operating margin") OR (Llama w/10 profit) OR (Llama w/10 EPS) OR (Llama w/10 "earnings per share") | 413 | 413 |
| torrent AND (dataset OR "training data") | 209 | 217 |
| ((Llama w/5 Facebook) OR (Llama w/5 Instagram) OR (Llama w/5 Reels) OR (Llama w/5 whatsapp) OR (Llama w/5 Threads) OR (Llama w/5 oculus) OR (Llama w/5 metaverse) OR (Llama w/5 orion) OR (Llama w/5 rayban)) AND (integrate OR incorporate OR augment OR monetize OR monetization) | 208 | 731 |
| (licens* w/3 books) OR (licens* w/3 textbooks) OR (licens* w/3 novels) OR (licens* w/3 literature) | 194 | 240 |
| "publicly available datasets" AND llama | 189 | 707 |
| (litigation OR lawsuit OR "fair use") w/20 (Kadrey OR Silverman OR Golden OR Woodson OR Greer OR Snyder OR Hwang OR Coates OR Lippman OR Klam OR Diaz OR Díaz OR Terkeurst OR Farnsworth) | 99 | 252 |
| ("Meta AI" w/10 budget) OR ("Meta AI" w/10 "operational expenses") OR ("Meta AI" w/10 "gross margin") OR ("Meta AI" w/10 "operating margin") OR ("Meta AI" w/10 profit) OR ("Meta AI" w/10 EPS) OR ("Meta AI" w/10 "earnings per share") | 96 | 96 |
| ((metaAI w/5 Facebook) OR (metaAI w/5 Instagram) OR (metaAI w/5 Reels) OR (metaAI w/5 whatsapp) OR (metaAI w/5 Threads) OR (metaAI w/5 oculus) OR (metaAI w/5 metaverse) OR (metaAI w/5 orion) OR (metaAI w/5 rayban)) AND (integrate OR incorporate OR augment OR monetize OR monetization) | 88 | 90 |
| (Llama w/15 stock) AND (price OR valuation OR increase OR impact OR decrease) | 43 | 46 |
| (christopher w/3 farnsworth) OR "blood oath" OR "president's vampire" OR "red, white, and blood" OR "red, white, & blood" OR "a nathaniel cade story" OR "the burning men" OR "eternal world" OR killfile OR "Deep state: a nathaniel cade story" OR ("deep state" AND farnsworth) OR (flashmob AND farnsworth) | 35 | 35 |
| (MetaAI w/10 budget) OR (MetaAI w/10 "operational expenses") OR (MetaAI w/10 "gross margin") OR (MetaAI w/10 "operating margin") OR (MetaAI w/10 profit) OR ("Met AI" w/10 EPS) OR (MetaAI w/10 "earnings per share") | 30 | 40 |
| (book* w/10 long-range) OR (book* w/10 "context model*") | 22 | 22 |
| ("Meta AI" w/15 stock) AND (price OR valuation OR increase OR impact OR decrease) | 16 | 16 |
| (eleuther w/20 books3) OR (eleutherAI w/20 books3) | 12 | 12 |

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| (MetaAI w/15 stock) AND (price OR valuation OR increase OR impact OR decrease) | 8 | 8 |
| eye w/20 books3 | 0 | 0 |

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| Books | 3 | 3 |
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| B3g | 0 | 0 |
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| Libgen | 0 | 0 |
| "library genesis" | 0 | 0 |
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